

MEMORANDUM ENDORSED

June 1, 2022

VIA ECF

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 6/2/2022

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RE: *Owen et al., v. Elastos Foundation, et al.*, No. 1:19-cv-5462 (GHW)

Dear Judge Woods:

Plaintiffs Mark Owen and James Wandling (“Plaintiffs”) and Defendants Elastos Foundation, Feng Han, and Rong Chen (the “Defendants”) jointly submit this letter pursuant to Your Honor’s instruction at the May 26, 2022 conference concerning the application of Chinese law to document discovery in this matter.

Following the conference, the Parties were unable to reach a stipulation on the nature, extent, and effects of Chinese law and its impact here. Accordingly, the Parties propose the following modified briefing schedule to permit the Parties to present the relevant information to the Court regarding the nature and extent of and effect of foreign law in connection with Plaintiffs’ motion to compel:

- Plaintiffs will file their motion to compel by June 13, 2022.
- Defendants will file their opposition by July 8, 2022.
- Plaintiffs will file their reply by July 22, 2022.

Respectfully submitted,

/s/ Javier Bleichmar
Javier Bleichmar

BLEICHMAR FONTI & AULD LLP
7 Times Square, 27th Floor
New York, NY 10036

Counsel for Plaintiffs

/s/ Kenneth Herzinger
Kenneth Herzinger

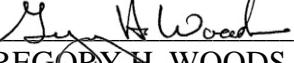
PAUL HASTINGS LLP
101 California Street, 48th Floor
San Francisco, CA 94111

Counsel for Defendants

Application granted. The deadline for Plaintiffs to file and serve their motion to compel is June 13, 2022. Defendants’ opposition is due no later than July 8, 2022. Plaintiffs’ reply, if any, is due no later than July 22, 2022.

SO ORDERED.

Dated: June 2, 2022
New York, New York



GREGORY H. WOODS
United States District Judge